

# SILLS CUMMIS & GROSS

A PROFESSIONAL CORPORATION

THE LEGAL CENTER  
ONE RIVERFRONT PLAZA  
NEWARK, NEW JERSEY 07102-5400  
(973) 643-7000

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Inv# 1667814  
Date 08/18/15  
02470034.000018 - MED

Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI # 22-1920331

Re: Pierre Grossman  
PO 650014726

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For legal services rendered through July 31, 2015.

			HOURS	
07/30/15	MED	Conference with J. Jurkevich regarding Judge's ruling on discovery disputes.	0.30	
		Mark E. Duckstein	0.30	\$157.50
07/02/15	JLJ	Review correspondence from P. Grossman regarding alleged deficiencies in responses to document requests.	0.20	
07/06/15	JLJ	Review correspondence from M. Stratton regarding discussion over Grossman's deficiency letter.	0.10	
07/07/15	JLJ	Telephone conference with M. Stratton regarding response to Grossman's deficiency letter.	0.50	
		Prepare draft correspondence to Grossman responding to deficiency letter.	1.80	
07/08/15	JLJ	Revise and finalize letter to P. Grossman regarding deficiency letter.	0.50	
07/13/15	JLJ	Review correspondence from P. Grossman regarding document production responses.	0.20	
		Prepare correspondence to M. Stratton regarding	0.10	

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			HOURS
		discovery dispute with P. Grossman, status of document production.	
07/14/15	JLJ	Exchange correspondence with M. Stratton regarding status of document production.	0.20
07/17/15	JLJ	Prepare draft letter to court requesting pre-motion conference.	1.50
		Prepare correspondence to P. Grossman requesting telephone conference to discuss discovery disputes.	0.20
07/20/15	JLJ	Review correspondence from P. Grossman regarding telephone conference.	0.20
07/21/15	JLJ	Telephone conference with P. Grossman regarding meet-and-confer over discovery disputes, exchange of document production.	0.20
		Telephone conference with M. Stratton regarding status of document production.	0.20
		Review client comments to draft pre-motion letter.	0.20
07/23/15	JLJ	Review notice of pre-motion conference with court.	0.10
		Exchange correspondence with M. Stratton regarding conference call with court.	0.20
07/24/15	JLJ	Review letter from Grossman to court responding to Elsevier's pre-motion conference request.	0.20
		Review letter from Grossman to court requesting pre-motion conference request on Elsevier's responses to his document requests.	0.30
		Review Rule 30(b)(6) deposition notices from Grossman to Elsevier plaintiffs.	0.30
		Prepare correspondence to client regarding pre-motion	0.10

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		HOURS
	conference letters, deposition notices from Grossman.	
	Legal research regarding entitlement to pre-judgment discovery in aid of enforcement under CPLR 5229.	2.30
	Prepare correspondence to P. Grossman regarding pre-motion conference call.	0.10
	Prepare correspondence to M. Stratton regarding legal research on pre-judgment discovery in aid of enforcement under CPLR 5229.	0.40
07/27/15	JLJ Telephone conference with chambers regarding Grossman's request for pre-motion conference.	0.10
	Prepare correspondence to Chambers forwarding Grossman's pre-motion conference request.	0.10
	Prepare response to Grossman pre-motion conference request.	1.80
	Review correspondence from client with minor edits to letter response on pre-motion conference, strategy regarding call to court.	0.10
07/28/15	JLJ Revise and finalize letter response to Grossman's pre-motion conference request.	0.30
	Review price list excerpt for document production.	0.20
	Telephone conference with M. Stratton regarding status of document production, strategy for conference call with court.	0.40
	Telephone conference with Chambers regarding additional authority on discovery pursuant to CPLR 5229.	0.10
07/29/15	JLJ Telephone conference with Court regarding discovery disputes, discovery schedule.	0.70

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		HOURS	
	Telephone conference with M. Stratton regarding production of additional documents.	0.20	
	Telephone conference with M. Stratton regarding production of PSI emails.	0.80	
	Prepare for pre-motion conference with court.	0.30	
	Prepare letter to P. Grossman objecting to 30(b)(6) deposition notices.	2.30	
07/30/15	JLJ Exchange correspondence with M. Stratton regarding status of document production.	0.40	
	Review correspondence from P. Grossman regarding service of his document production.	0.10	
	Review additional documents gathered by client for document production.	0.70	
07/31/15	JLJ Review correspondence from M. Stratton regarding customer service interactions.	0.40	
	Prepare correspondence to client regarding production of customer service interactions.	0.20	
	Review client documents to be produced.	4.20	
	Finalize letter to P. Grossman objecting to 30(b)(6) deposition notices.	0.20	
	Prepare deposition notice to P. Grossman.	0.30	
	Jason L. Jurkevich	24.00	\$8,400.00
	Total Fees	24.30	\$8,557.50

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Mark E. Duckstein - 0.30 x 525.00 = 157.50

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Jason L. Jurkevich	-	24.00	x	350.00	=	8,400.00
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Pacer	.80
Federal Express	57.38
Computerized Research	380.51

Total Disbursements	\$438.69
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<b>TOTAL THIS INVOICE</b>	<b>\$8,996.19</b>
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Prior Open Invoice (s)	\$4,397.81
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<b>TOTAL AMOUNT DUE</b>	<b>\$13,394.00</b>
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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI#22 - 1920331

RE: Pierre Grossman  
PO 650014726

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## REMITTANCE ADVICE

For legal services rendered through July 31, 2015.

Total Fees	\$8,557.50
Total Disbursements	\$438.69
<b>TOTAL THIS INVOICE</b>	<b>\$8,996.19</b>
Prior Open Invoice (s)	\$4,397.81
<b>TOTAL AMOUNT DUE</b>	<b>\$13,394.00</b>

TO INSURE PROPER CREDIT TO YOUR ACCOUNT PLEASE RETURN THIS  
REMITTANCE ADVICE WITH YOUR PAYMENT.

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Date 10/29/15  
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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI # 22-1920331

Re: Pierre Grossman  
PO 650014726

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For legal services rendered through September 30, 2015.

			HOURS	
08/06/15	MED	Conference with J. Jurkevich regarding option of dismissing claims against Grossman personally.	0.50	
08/11/15	MED	Conference with J. Jurkevich regarding settlement strategy.	0.30	
08/18/15	MED	Conference with J. Jurkevich regarding depositions.	0.40	
08/25/15	MED	Conference with J. Jurkevich regarding FRCP 30(b)(6) notice to corporate defendant and issues regarding PTI testimony and depth of analysis.	0.30	
08/27/15	MED	Conference with J. Jurkevich regarding absent witness adverse inference and proofs to demonstrate fraudulent subscriptions; legal research re: same.	0.90	
		Mark E. Duckstein	2.40	\$1,260.00
08/03/15	JLJ	Telephone conference with P. Doda, M. Stratton regarding production of all orders by defendants.	0.20	
08/04/15	JLJ	Review correspondence from P. Grossman regarding Elsevier objections to 30(b)(6) notice.	0.20	
		Prepare correspondence to M. Stratton regarding	0.10	

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		HOURS
	Grossman response to Elsevier objection to 30(b)(6) notice.	
08/05/15	JLJ Telephone conference with M. Stratton regarding status of document production, strategy for additional production, response to Grossman regarding 30(b)(6) topics, and preparation for deposition.	1.30
	Prepare correspondence to P. Grossman responding to letter on 30(b)(6) topics, proposing new schedule for depositions.	0.80
08/06/15	JLJ Analyze documents produced by Grossman for deposition preparation.	2.90
	Prepare pre-motion conference request to Court regarding 30(b)(6) deposition.	1.40
	Prepare supplemental document production of book order spreadsheet.	1.20
	Telephone conference with M. Stratton, P. Doda regarding strategy for discovery, settlement.	0.40
	Telephone conference with M. Stratton, Brazilian counsel regarding developments in Brazilian proceedings, strategy for settlement.	0.30
	Prepare correspondence to M. Stratton regarding additional document production in light of Grossman production.	0.30
08/07/15	JLJ Telephone conferences with Pierre Grossman and M. Gershenoff regarding settlement and discovery issues.	1.40
	Telephone conferences with M. Stratton regarding settlement, discovery issues, letter to court.	0.50
	Finalize pre-motion letter to court regarding protective	0.50



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		HOURS
	order for 30(b)(6) depositions.	
08/10/15	JLJ Review letter from P. Grossman to Court regarding opposition to protective order, cross motion to compel.	0.20
	Prepare correspondence to M. Stratton regarding letter from P. Grossman to Court regarding opposition to protective order, cross motion to compel.	0.20
	Telephone conference with M. Stratton regarding order from Court on deposition scope and schedule.	0.20
	Prepare correspondence to P. Grossman regarding court order, settlement discussion.	0.10
08/11/15	JLJ Telephone conference with M. Stratton regarding strategy for settlement communication to Grossman.	0.40
	Telephone conferences with M. Gershenoff regarding settlement offer.	0.30
	Telephone conference with P. Grossman regarding settlement offer, deposition schedule.	0.30
	Telephone conference with M. Stratton and Maribel Burgos regarding 30(b)(6) deposition.	0.80
	Prepare correspondence to M. Burgos regarding documents for deposition preparation.	0.30
	Review additional documents from client for production.	1.40
	Review documents produced by P. Grossman.	2.30
08/12/15	JLJ Telephone conference with TSG reporting regarding cost to videotape deposition.	0.10
	Prepare correspondence to P. Grossman confirming	0.20

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		HOURS
	deposition schedule.	
	Telephone conference with M. Stratton to review additional spreadsheets reflecting orders for document production.	0.60
	Revise and finalize additional document production to Grossman.	1.50
	Prepare deposition outline for Grossman deposition.	2.30
	Exchange correspondence with P. Grossman regarding location of 30(b)(6) deposition.	0.20
08/13/15	JLJ Analyze issues regarding possible attendance of M. Gershenoff at Grossman deposition and 30(b)(6) deposition.	0.50
	Exchange correspondence with court reporter regarding final arrangements for Grossman deposition.	0.20
	Analyze documents to correspond to fraudulent subscriptions identified in Amended Complaint.	3.90
08/14/15	JLJ Telephone conference with M. Burgos, M. Stratton, and J. Spence (PSI) for 30(b)(6) deposition preparation.	6.80
	Prepare outline for P. Grossman deposition.	2.50
08/16/15	JLJ Prepare for deposition of Pierre Grossman.	4.70
08/17/15	JLJ Take deposition of Pierre Grossman.	9.50
	Meet with M. Stratton and Maribel Burgos to prepare for 30(b)(6) deposition.	2.10
08/18/15	JLJ Defend 30(b)(6) deposition of Elsevier plaintiffs.	3.80
	Settlement discussion with M. Stratton, P. Grossman,	0.50

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		HOURS
	M. Gershenoff.	
	Meeting with Maribel Burgos, M. Stratton to discuss strategy, instructions for deposition.	0.50
	Meeting with M. Stratton regarding litigation, discovery strategy.	0.80
08/20/15	JLJ Prepare estimated litigation budget through end of discovery and summary judgment.	1.50
	Review correspondence from M. Stratton regarding coordination with Wiley counsel on proofs.	0.20
	Telephone conference with M. Stratton regarding expert discovery schedule.	0.30
	Review case management schedule regarding expert discovery.	0.10
08/21/15	JLJ Review correspondence from P. Grossman requesting consent to extension of fact discovery period.	0.10
	Prepare correspondence to M. Stratton regarding Grossman request to extend fact discovery, strategy for response to same.	0.20
08/24/15	JLJ Telephone conference with M. Stratton regarding strategy for response to Grossman request to extend fact discovery.	0.40
	Prepare correspondence to P. Grossman responding to request to extend fact discovery.	0.20
08/25/15	JLJ Review letter from Grossman to Court requesting extension of fact discovery.	0.20
	Prepare draft letter to Court responding to Grossman's request to extend fact discovery.	1.00

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			HOURS
Analyze issues regarding use of PSI as fact witness versus expert.			0.70
Review correspondence from P. Grossman to FTC regarding complaint against publishers and forward same to M. Stratton.			0.10
08/26/15	JLJ	Revise draft letter to court opposing request to extend discovery based on client comments.	0.50
Review further correspondence from P. Grossman to FTC regarding complaint against publishers and forward same to M. Stratton.			0.10
08/27/15	JLJ	Telephone conference with P. Doda, M. Stratton regarding potential for settlement, litigation strategy.	0.80
Telephone conference with J. Barker, N. Haff, J. Moss regarding information from Wiley case for use in proofs against Grossman.			0.60
Telephone conference with M. Stratton regarding additional discovery requests to PTL.			0.30
Revise and finalize letter to court in response to Grossman request to extend fact discovery.			0.20
Review correspondence from P. Grossman to U.S. State Department and attached spreadsheet regarding complaint against publishers and forward same to M. Stratton, P. Doda.			0.20
Legal research regarding applicability of common interest doctrine to discussions between Wiley and Elsevier and outside counsel regarding respective lawsuits against Grossman.			1.10
08/28/15	JLJ	Review order denying Grossman request to extend	0.20

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			HOURS
fact discovery.			
Prepare correspondence to P. Grossman serving order denying request to extend discovery.			0.10
Review correspondence from Wiley counsel forwarding damage documents from inquest.			0.30
08/31/15	JLJ	Review documents provided by Wiley regarding proofs for damages inquest.	0.60
Prepare 30(b)(6) deposition notice to PTI.			1.40
09/01/15	JLJ	Revise deposition notice to PTI.	0.40
Prepare document requests to PTI.			1.20
Prepare correspondence to M. Stratton regarding draft discovery requests to PTI.			0.10
Prepare correspondence to R. Saad serving discovery requests to PTI.			0.20
09/02/15	JLJ	Review correspondence from P. Grossman to Court requesting subpoenas to depose PSI, other Elsevier personnel and analyze strategy for response to same.	0.80
Exchange correspondence with M. Stratton regarding strategy for response to letter from P. Grossman to Court requesting subpoenas to depose PSI, other Elsevier personnel.			0.70
Telephone conference with M. Gershenoff regarding formal response to settlement proposal made after 30(b)(6) deposition.			0.10
09/03/15	JLJ	Review correspondence from R. Saad regarding discovery requests to PTI.	0.10
Analyze strategy for response to R. Saad regarding			0.80

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refusal to comply with discovery requests.		
Prepare correspondence to M. Stratton regarding R. Saad correspondence refusing to comply with discovery requests, strategy for response to same.		0.20
Prepare draft letter to court responding to Grossman's correspondence of 9/2/15.		1.00
09/04/15	JLJ Telephone conference with M. Stratton regarding strategy for response to R. Saad.	0.50
	Review additional email correspondence from P. Grossman to Court regarding request for discovery.	0.10
	Prepare correspondence to M. Stratton regarding additional email correspondence from P. Grossman to Court regarding request for discovery, strategy for response to same.	0.20
	Prepare subpoena to PTI attaching document requests.	0.50
	Prepare correspondence to R. Saad responding to refusal to comply with discovery requests and deposition notice, offering to provide subpoena in return for acceptance of service.	0.40
	Telephone conference with M. Stratton regarding strategy for response to latest Grossman correspondence.	0.30
	Revise, finalize and file letter to Court responding to P. Grossman correspondence of 9/2/15.	0.20
09/08/15	JLJ Telephone conference with M. Stratton, Elsevier's Brazilian counsel regarding logistics of taking deposition in Brazil for use in U.S. litigation, status of Brazilian proceedings.	0.50

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		HOURS
	Review correspondence from P. Grossman to R. Mobed threatening subpoena.	0.20
	Review correspondence from P. Grossman threatening legal action in foreign countries.	0.20
09/10/15	JLJ Telephone conference with law clerk regarding clarification of order of correspondence with the court over discovery dispute.	0.10
	Review Court order requiring parties to meet and confer regarding discovery disputes before raising them with the court.	0.20
	Prepare correspondence to M. Stratton regarding order requiring parties to meet and confer regarding discovery disputes, strategy for response to same.	0.20
	Telephone conference with M. Stratton regarding strategy for meet and confer with Grossman.	0.60
	Prepare correspondence to P. Grossman serving court order requiring parties to meet and confer, proposing schedule for same in light of upcoming holidays.	0.40
09/11/15	JLJ Prepare document subpoenas to Chase Bank, LinkedIn.	1.60
	Research registered agents for service of subpoenas to LinkedIn and Chase Bank.	0.40
	Telephone conference with Chase Bank Subpoena Processing Center for procedures to serve, expedite processing of subpoena.	0.20
	Prepare correspondence to Chase serving document subpoena.	0.20
	Prepare correspondence to LinkedIn serving	0.20

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	HOURS
document subpoena.	
Prepare correspondence to P. Grossman serving notices of document subpoenas to Chase and LinkedIn.	0.20
Prepare Notices of Subpoenas to Chase and LinkedIn.	0.30
Review correspondence from P. Grossman regarding meet and confer over production of unredacted spreadsheet and other "confidential" information.	0.10
Telephone conference with P. Grossman to meet and confer over production of unredacted spreadsheet and confidential information.	0.40
Telephone conference with M. Stratton regarding issues surrounding production of unredacted spreadsheet, use of confidentiality order.	0.30
Exchange correspondence with M. Stratton regarding issues surrounding production of unredacted spreadsheet, use of confidentiality order, strategy for response to Grossman over meet and confer issues.	0.30
Prepare correspondence to P. Grossman regarding meet and confer issues.	0.20
Review correspondence from M. Stratton to PSI regarding production of unredacted spreadsheet.	0.20
09/16/15 JLJ Telephone conference with M. Stratton, J. Spence (PSI) regarding production of unredacted spreadsheet.	0.50
Review correspondence from J. Spence regarding production of unredacted spreadsheet.	0.20
Prepare correspondence to P. Grossman proposing to produce unredacted spreadsheet pursuant to	0.20



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	HOURS
confidentiality order.	
Review correspondence from P. Grossman agreeing to proposal to produce unredacted spreadsheet pursuant to confidentiality order, and requesting draft for review.	0.10
Prepare correspondence to P. Grossman forwarding proposed confidentiality order.	0.10
Review correspondence from P. Grossman rejecting proposed confidentiality order without explanation.	0.10
Prepare correspondence to P. Grossman requesting copy of correspondence previously sent to court without copy to Elsevier.	0.10
Prepare correspondence to Court regarding Elsevier's position following meet-and-confer with P. Grossman.	1.10
Prepare correspondence to M. Stratton with draft letter to Court.	0.10
Revise, finalize and file draft letter to Court based on client comments.	0.30
Telephone conference with M. Stratton regarding strategy for letter to Court in accordance with 9-10-15 Order.	0.30
09/17/15 JLJ Prepare correspondence to M. Stratton regarding letter from P. Grossman to Court regarding latest discovery dispute.	0.10
Review letter submission from Grossman to Court regarding discovery dispute.	0.20
Telephone conference with chambers regarding leave to submit response to P. Grossman letter.	0.20

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		HOURS
	Prepare reply letter to Court regarding P. Grossman letter dated September 13, 2015.	0.50
	Review exchange of correspondence between P. Grossman and US Consul in Brazil regarding FTC complaint, request for FBI investigation.	0.20
	Review correspondence from P. Grossman threatening legal action in Brazil against J. Jurkevich.	0.20
09/18/15	JLJ Review correspondence from P. Grossman to court regarding deposition of PSI.	0.20
	Prepare correspondence to M. Stratton regarding further correspondence from P. Grossman regarding deposition of PSI.	0.10
09/21/15	JLJ Review ECF notice of filing of P. Grossman letter dated 9/13/15.	0.10
09/22/15	JLJ Review Court order requiring P. Grossman to identify "confidential" information, identify objections to proposed confidentiality order, and meet and confer over discovery issues before raising with court.	0.20
	Prepare correspondence to M. Stratton regarding Court order on discovery dispute.	0.10
	Prepare correspondence to P. Grossman forwarding Court Order of 9-21-15 and advising of availability for meet-and-confer.	0.20
	Review ECF notice of filing of P. Grossman 9-18-15 sur-reply letter on discovery dispute.	0.10
09/24/15	JLJ Review correspondence from P. Grossman regarding discovery dispute.	0.20
	Prepare correspondence to M. Stratton regarding	0.30

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			HOURS	
		strategy for letter to Court responding to P. Grossman 9/24/15 letter regarding discovery dispute.		
09/25/15	JLJ	Prepare letter to Court responding to Grossman's 9-24-15 letter regarding identification of "confidential" information and objections to discovery dispute.	1.00	
		Prepare correspondence to M. Stratton forwarding draft letter to Court responding to Grossman's 9-24-15 letter.	0.10	
09/30/15	JLJ	Review docketed letters from P. Grossman regarding discovery issues.	0.20	
		Revise response letter to Court regarding Grossman's September 24, 2015 discovery correspondence.	0.50	
		Telephone conference with M. Stratton regarding discovery dispute correspondence, pre-conference joint status letter to Court.	0.20	
		Prepare draft joint status letter to court in advance of status conference.	1.40	
		Prepare correspondence to M. Stratton forwarding ECF notices of P. Grossman letter and email to court dated 9-24-15.	0.20	
		Jason L. Jurkevich	94.50	\$33,075.00
08/11/15	MK	Attended to processing of documents to be produced.	3.00	
08/12/15	MK	Complete organization and assembly of documents to be produced.	1.00	
		Marianne Kehoe	4.00	\$780.00
		Total Fees	100.90	\$35,115.00

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Mark E. Duckstein	-	2.40	x	525.00	=	1,260.00
Jason L. Jurkevich	-	94.50	x	350.00	=	33,075.00
Marianne Kehoe	-	4.00	x	195.00	=	780.00

Service Of Process/Sheriff Fees	161.00
Court Reporter Transcript Fees	68.34
Train Fare	19.00
Pacer	14.50
Duplication	82.68
Federal Express	32.00
Computerized Research	801.68
Video/Audio Tape Duplication	25.00
Duplication	103.44
Color Copies	106.00

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Total Disbursements	\$1,413.64
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<b>TOTAL THIS INVOICE</b>	<b>\$36,528.64</b>
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Less Payments Applied	(\$4,397.81)
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<b>BALANCE DUE THIS INVOICE</b>	<b>\$32,130.83</b>
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(973) 643-7000

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Inv# 1671486  
Date 10/29/15  
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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI#22 - 1920331

RE: Pierre Grossman  
PO 650014726

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## REMITTANCE ADVICE

For legal services rendered through September 30, 2015.

Total Fees	\$35,115.00
Total Disbursements	\$1,413.64
<b>TOTAL THIS INVOICE</b>	<b>\$36,528.64</b>
Less Payments Applied	(\$4,397.81)
<b>BALANCE DUE THIS INVOICE</b>	<b>\$32,130.83</b>

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Date 11/10/15  
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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI # 22-1920331

Re: Pierre Grossman  
PO 650014726

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For legal services rendered through October 31, 2015.

			HOURS	
10/15/15	MED	Conference with J. Jurkevich regarding trial proofs and requesting adverse inference charges.	0.40	
		Legal research regarding adverse inference charges.	0.50	
		Review terms and conditions of purchase orders.	0.30	
10/19/15	MED	Legal research regarding requesting shift in burden of proof as part of adverse inference charge.	0.20	
10/29/15	MED	Telephone conference with P. Doda and J. Jurkevich regarding Wiley default judgment and trial strategy issues (motions for adverse inferences).	0.50	
		Mark E. Duckstein	1.90	\$997.50
10/01/15	JLJ	Revise draft joint status letter based on client comments.	0.30	
		Prepare correspondence to P. Grossman with draft joint status letter for comment and review.	0.10	
		Revise draft joint status letter to court based on language inserted by P. Grossman.	0.50	

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		HOURS
	Prepare correspondence to P. Grossman with revised draft status letter to Court.	0.10
	Revise, finalize and file letter in response to P. Grossman letter dated 9-24-15.	0.20
	Finalize joint status letter to court in advance of status conference.	0.20
10/02/15	JLJ Review correspondence from P. Grossman regarding joint status letter.	0.20
	Prepare correspondence to P. Grossman responding to objection to reference to Rivkin Radler in joint status letter.	0.30
	Prepare correspondence to M. Stratton regarding discovery issues to discuss with Court on 10/8 conference call.	0.20
	Prepare correspondence to P. Grossman forwarding memo endorsement from Court.	0.10
	Review Second Circuit opinion regarding applicability of RICO to foreign conduct in case granted certiorari by Supreme Court.	0.90
	Prepare correspondence to M. Stratton regarding recent case granted certiorari by Supreme Court on applicability of RICO to foreign conduct in case <b>REDACTED</b>	0.40
10/07/15	JLJ Review Second Circuit decision in RJR Nabsico case regarding extraterritorial effect of RICO Statute.	0.50
	Telephone conference with M. Stratton regarding strategy for status conference call with Court.	0.70

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			HOURS
		Review correspondence from P. Grossman to N.Y. Attorney General regarding allegations against Elsevier, publishers and PSI.	0.20
		Prepare correspondence to P. Grossman regarding conference call information for telephonic status conference with Court.	0.20
10/08/15	JLJ	Participate in telephone case management conference.	0.80
		Telephone conference with E. Howard (Chase Subpoena Center) regarding time to respond to subpoena for checks.	0.20
		Prepare fax to Chase Subpoena Center regarding dates of checks sought by subpoena.	0.20
10/09/15	JLJ	Review correspondence from P. Grossman to Court requesting permission to take deposition of PSI.	0.40
10/15/15	JLJ	Review written response to subpoena, document production from LinkedIn regarding Eduardo Santos account.	0.80
		Prepare correspondence to M. Stratton regarding document production from LinkedIn.	0.20
10/16/15	JLJ	Review memo endorsement from Court denying request for deposition of PSI.	0.10
		Prepare correspondence to M. Stratton regarding memo endorsement from Court denying request for deposition of PSI.	0.10
10/19/15	JLJ	Analyze issues relating to adverse inference motion.	0.80
10/23/15	JLJ	Legal research regarding adverse inference.	1.60
10/28/15	JLJ	Review Appellate Division order reinstating Wiley	0.30



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		HOURS	
	default judgment.		
	Prepare correspondence to M. Stratton regarding Appellate Division order reinstating Wiley default judgment.	0.10	
10/29/15	JLJ Telephone conference with Court regarding trial schedule.	0.10	
	Telephone conference with P. Doda regarding Wiley default judgment, strategy for trial, pre-trial motions, and settlement.	0.50	
	Review correspondence from P. Grossman regarding Wiley case.	0.10	
	Telephone conference with M. Stratton regarding trial schedule.	0.10	
10/30/15	JLJ Telephone conference with M. Stratton regarding trial schedule, appearance of witnesses at trial.	0.40	
	Prepare correspondence to P. Grossman regarding availability for January 11, 2016 trial.	0.10	
	Review correspondence from P. Grossman confirming availability for trial on 1/11/16.	0.10	
	Telephone conference with Court confirming parties' availability for trial on 1/11/16.	0.10	
Jason L. Jurkevich		12.20	\$4,270.00
Total Fees		14.10	\$5,267.50

Mark E. Duckstein	-	1.90	x	525.00	=	997.50
Jason L. Jurkevich	-	12.20	x	350.00	=	4,270.00

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Outside Messenger Services	65.00
Telephone Toll Charges	3.84
Computerized Research	152.21
	<hr/>
Total Disbursements	\$221.05
	<hr/>
<b>TOTAL THIS INVOICE</b>	<b>\$5,488.55</b>
	<hr/> <hr/>

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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI#22 - 1920331

RE: Pierre Grossman  
PO 650014726

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## REMITTANCE ADVICE

For legal services rendered through October 31, 2015.

Total Fees	\$5,267.50
Total Disbursements	\$221.05
<b>TOTAL THIS INVOICE</b>	<b>\$5,488.55</b>

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Date 12/23/15  
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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI # 22-1920331

Re: Pierre Grossman  
PO 650014726

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For legal services rendered through November 30, 2015.

			HOURS	
11/25/15	MED	Conference with J. Jurkevich regarding relief to be sought in connection with motions for adverse inferences.	0.30	
		Mark E. Duckstein	0.30	\$157.50
11/03/15	JLJ	Review transcript of telephonic status conference on 10-8-15.	0.20	
		Prepare correspondence to P. Grossman forwarding transcript of telephonic status conference on 10-8-15.	0.10	
11/04/15	JLJ	Review pre-trial scheduling order.	0.20	
		Prepare correspondence to M. Stratton regarding pre-trial scheduling order.	0.10	
11/05/15	JLJ	Prepare correspondence to P. Grossman regarding scheduling order, call-in information for telephone conference.	0.10	
11/09/15	JLJ	Review letter from P. Grossman to court regarding pre-trial request to raise Brazilian proceedings at trial.	0.30	
		Prepare correspondence to M. Stratton regarding P.	0.10	

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			HOURS
		Grossman letter to court regarding pre-trial request to raise Brazilian proceedings at trial.	
11/10/15	JLJ	Telephone conference with court, P. Grossman regarding pre-trial conference.	0.70
		Telephone conference with M. Stratton regarding trial preparation, settlement strategy.	0.40
11/11/15	JLJ	Prepare correspondence to Court with copy of First Department opinion reinstating Wiley's default judgment.	0.20
		Review correspondence from P. Grossman with copy of Wyndham questionnaire response.	0.20
		Review correspondence from M. Stratton regarding investigation of Grossman assets.	0.10
11/12/15	JLJ	Analyze issues for trial.	0.30
11/13/15	JLJ	Review correspondence from P. Grossman to Court regarding Brazilian proceedings.	0.20
11/17/15	JLJ	Review correspondence from P. Grossman with information subpoenas to Lexus dealers.	0.20
11/18/15	JLJ	Telephone conference with M. Gershenoff regarding settlement.	0.10
		Telephone conference with M. Stratton regarding call from Gershenoff asking about settlement.	0.20
11/19/15	JLJ	Telephone conference with M. Stratton regarding settlement communication from M. Gershenoff, strategy for response.	0.20
		Review correspondence from Court Reporters with transcript of 11/10/15 conference call with Court.	0.10

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			HOURS	
		Prepare correspondence to P. Grossman with transcript of 11/10/15 conference call with Court.	0.10	
11/20/15	JLJ	Telephone communication to Max Gershenoff regarding settlement proposal.	0.20	
		Review correspondence from P. Grossman to Court requesting protection.	0.10	
		Review correspondence from P. Grossman to FBI regarding complaint.	0.10	
11/23/15	JLJ	Prepare pre-trial order.	2.80	
11/24/15	JLJ	Review response to subpoena from JP Morgan Chase.	0.20	
		Review P. Grossman deposition transcript for designations for pre-trial order.	4.70	
		Prepare jury instructions for civil RICO claim.	3.40	
11/25/15	JLJ	Prepare pre-trial order.	8.50	
		Prepare correspondence to Court regarding accusations made by P. Grossman.	1.40	
11/26/15	JLJ	Review correspondence from P. Grossman to Court regarding settlement.	0.20	
11/30/15	JLJ	Prepare proposed jury instructions.	8.60	
		Review court order regarding recent correspondence from P. Grossman.	0.20	
		Review correspondence from M. Stratton regarding research on motion to allow Rayan to testify remotely.	0.20	
Jason L. Jurkevich			34.70	\$12,145.00
Total Fees			35.00	\$12,302.50

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Mark E. Duckstein	-	0.30	x	525.00	=	157.50
Jason L. Jurkevich	-	34.70	x	350.00	=	12,145.00

Court Reporter Transcript Fees	448.94
Pacer	6.50
Computerized Research	607.88

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Total Disbursements	\$1,063.32
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<b>TOTAL THIS INVOICE</b>	<b>\$13,365.82</b>
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Prior Open Invoice (s)	\$37,619.38
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<b>TOTAL AMOUNT DUE</b>	<b>\$50,985.20</b>
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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI#22 - 1920331

RE: Pierre Grossman  
PO 650014726

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## REMITTANCE ADVICE

For legal services rendered through November 30, 2015.

Total Fees	\$12,302.50
Total Disbursements	\$1,063.32
<b>TOTAL THIS INVOICE</b>	<b>\$13,365.82</b>
Prior Open Invoice (s)	\$37,619.38
<b>TOTAL AMOUNT DUE</b>	<b>\$50,985.20</b>

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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI # 22-1920331

Re: Pierre Grossman  
PO 650014726

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For legal services rendered through December 31, 2015.

		HOURS
12/09/15	MED Prepare adverse inference in limine motion.	0.50
	Review e-mail from P. Grossman.	0.10
12/17/15	MED Address ability to either attach bank account on a pre-judgment basis or seek the entry of default judgment on an expedited basis.	0.50
	Legal research regarding collateral estoppel effect of default judgment on proofs/issues concerning claims against P. Grossman.	1.20
12/23/15	MED Prepare motion for pre-judgment attachment.	0.70
	E-mails regarding writ of attachment application.	0.10
12/24/15	MED Revise attachment motion papers.	1.50
12/28/15	MED E-mails regarding Order to Show Cause application and review same.	0.80
12/29/15	MED E-mails to J. Jurkevich regarding Order to Show Cause application.	0.30
12/30/15	MED Review authorities regarding procedure followed where some defendants default and others appear.	0.60

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			HOURS	
12/31/15	MED	Telephone conference with J. Jurkevich regarding submission to court responding to concern over potential for inconsistent judgments.	0.30	
		Mark E. Duckstein	6.60	\$3,465.00
12/01/15	JLJ	Review correspondence with R. Guman regarding attendance at trial.	0.20	
		Prepare proposed jury instructions.	9.20	
12/02/15	JLJ	Prepare correspondence to M. Stratton regarding proposed jury instructions, conference to discuss trial exhibits.	0.20	
		Prepare trial exhibits and list for pretrial order.	7.00	
12/03/15	JLJ	Telephone conference with M. Stratton regarding pre-trial order and submissions.	1.10	
		Prepare trial exhibits and list for pretrial order.	6.70	
12/04/15	JLJ	Exchange correspondence with A. Pitts, M. Stratton regarding trial appearance, preparation for testimony.	0.30	
		Prepare correspondence to court reporter regarding payment for transcript of M. Burgos deposition.	0.20	
		Prepare correspondence to M. Stratton forwarding transcript of M. Burgos deposition.	0.10	
		Telephone conference with M. Stratton regarding revised pretrial order.	0.10	
		Prepare correspondence to P. Grossman with proposed joint pretrial order.	0.20	
		Analyze damage calculation for pretrial order.	3.40	
		Prepare in limine motion for video appearance by	1.00	

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		HOURS
	witnesses.	
12/06/15	JLJ Prepare revised summary exhibit with damage calculation.	2.30
12/07/15	JLJ Exchange correspondence with M. Stratton, G. Washington regarding records of additional orders.	0.30
	Prepare revised summary exhibit.	1.20
	Legal research regarding adverse inference, duty of corporate officer to produce corporate documents in possession, custody or control.	3.90
	Prepare brief in support of motion in limine for adverse inference.	3.40
12/08/15	JLJ Review correspondence from P. Grossman regarding response to Brazilian Federal Police Report.	0.30
	Prepare brief in support of motion in limine for adverse inference.	9.10
12/09/15	JLJ Prepare proposed voir dire questions for prospective jurors.	1.40
	Revise brief in support of motion in limine.	1.90
	Prepare declaration and exhibits in support of motion in limine.	1.90
	Telephone conference with M. Stratton regarding pretrial preparation tasks.	0.20
	Analyze potential motion for sanctions based on improper communications by P. Grossman.	0.50
	Prepare notice of motion in limine.	0.30
	Prepare correspondence to P. Grossman regarding revised pretrial order, additional exhibits.	0.50

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	HOURS
Review motion in limine by Grossman to preclude testimony and allow evidence of accusations in Brazil.	1.20
Review pretrial exhibit binder.	0.30
Revise pretrial order.	0.40
Review Evidence Rules regarding requirements for foundational evidence and analyze with respect to certifications of authenticity by non-party subpoena recipients.	0.70
12/10/15 JLJ Prepare motion in limine to allow remote testimony by Rayan Guman.	2.70
Revise motion in limine for adverse inference to include argument based on contract terms.	0.50
Analyze argument for motion in limine for adverse inference based on contract terms.	0.40
Revise and finalize brief in support of adverse inference motion.	0.60
Revise and finalize requests to charge.	0.60
Telephone conference with Chambers regarding logistics for filing, submission of pretrial documents.	0.20
Telephone conference with M. Stratton regarding pretrial documents, motion for sanctions.	0.30
Exchange correspondence with M. Stratton regarding arguments for motions in limine.	0.30
Prepare cover letter to Court forwarding courtesy copies of pretrial submissions.	0.30
Revise and finalize proposed pretrial order.	0.30
Prepare e-filings of pretrial submissions.	0.50

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		HOURS
	Prepare email correspondence to Court, P. Grossman with pretrial submissions.	0.40
	Review and correct binders of pretrial submissions.	2.40
12/11/15	JLJ Prepare letter requesting pre-motion conference for sanctions motion.	2.30
	Legal research regarding inherent authority to impose sanctions.	0.60
	Revise sanctions letter based on client comments.	0.60
	Exchange correspondence with Judge Failla's law clerk regarding submissions from P. Grossman.	0.20
12/14/15	JLJ Telephone conference with Court regarding availability for conference call on request for sanctions.	0.10
	Review endorsed letter ordering conference call to discuss request for sanctions.	0.10
	Prepare correspondence to P. Grossman forwarding endorsed letter ordering conference call to discuss request for sanctions.	0.10
	Review endorsed letter denying P. Grossman request for attorney referral for "civil rights" complaint.	0.10
	Legal research for opposition to Grossman motion in limine regarding reliance presumption in RICO, standards for relevant evidence, Rule 403 prejudice or confusion as grounds for exclusion.	2.30
12/15/15	JLJ Prepare opposition brief to Grossman motion in limine; conference with M. Duckstein regarding same.	6.80
12/16/15	JLJ Prepare opposition brief to Grossman motion in limine.	2.90

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		HOURS
12/17/15	JLJ Telephone conference with Court, P. Grossman regarding pre-motion conference for sanctions against Grossman.	0.80
	Telephone conference with M. Stratton regarding strategy for pre-motion conference with Court on sanctions against Grossman.	0.20
	Review and analyze correspondence from P. Grossman regarding hold placed on IBIS account by Wiley.	0.30
	Revise and finalize opposition brief on Grossman motion in limine.	1.40
	Prepare declaration and exhibits in opposition to Grossman motion in limine.	0.80
12/18/15	JLJ Review correspondence from P. Grossman to NY Attorney General's office regarding Wiley's restraining notice on IBIS account.	0.10
12/21/15	JLJ Review correspondence from P. Grossman regarding complaints about Wiley restraint of IBIS account.	0.20
12/22/15	JLJ Review correspondence from P. Grossman regarding request to M. Gershenoff to file motion to vacate Wiley restraining notice.	0.20
	Analyze strategy for motion for writ of attachment of IBIS account, dismissal of claims against Grossman.	0.60
	Telephone conference with M. Stratton regarding proposed writ of attachment application on IBIS account.	0.30
12/23/15	JLJ Telephone conference with P. Doda, M. Stratton regarding motion for attachment against IBIS account.	0.50

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		HOURS
	Review correspondence from P. Grossman regarding fraud investigation in Brazil.	0.20
	Review Grossman email to Judge Failla attaching draft order to show cause papers to vacate Wiley restraining notice.	0.30
	Prepare brief in support of order to show cause for writ of attachment.	7.30
	Legal research regarding requirements for writ of attachment, property subject to attachment.	1.10
	Prepare declaration in support of application for writ of attachment.	0.40
	Revise proposed order to show cause for writ of attachment.	0.40
12/24/15	JLJ Revise and finalize brief in support of order to show cause for writ of attachment.	2.80
	Legal research for standards for temporary restraints in Second Circuit.	0.30
	Revise and finalize order to show cause for writ of attachment.	0.80
	Revise and finalize supporting declaration and exhibits.	1.40
12/28/15	JLJ Revise and finalize brief, other papers in support of request for attachment.	1.50
	Telephone conference with Chambers regarding procedure for following application for order to show cause.	0.30
	Telephone conference with P. Grossman regarding application for order to show cause, attachment.	0.30

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		HOURS	
	Prepare correspondence to Court, P. Grossman regarding application for order to show cause for attachment.	0.20	
	Review order setting conference to discuss application for writ of attachment, stay of trial.	0.20	
	Prepare proof of service for order to show cause papers.	0.20	
	E-file order to show cause papers in accordance with Court order.	0.30	
	Prepare transmittal letter to Orders and Judgments Clerk with hard copy of order to show cause papers.	0.30	
12/30/15	JLJ Telephone conference with Court, P. Grossman regarding application for writ of attachment.	0.80	
	Review authorities cited by Court regarding deferral of damage inquest as to defaulted parties when some defendants have appeared.	0.40	
	Prepare correspondence to M. Stratton summarizing conference call with Court, P. Grossman regarding request for writ of attachment, stay of trial.	0.60	
	Analyze issues for argument to court in support of final default judgment before dismissal of claims against Grossman.	0.30	
12/31/15	JLJ Conference with M. Duckstein regarding inconsistent judgment issue raised by Court.	0.30	
	Jason L. Jurkevich	111.20	\$38,920.00
12/09/15	EVC Assist counsel with preparation and collection of pretrial order exhibits.	2.80	



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			HOURS	
12/10/15	EVC	Assist with preparation of pretrial order and collection of exhibits for same.	1.60	
		Edward V. Colavito	4.40	\$924.00
12/11/15	MD	Review of document for proper format and compliance with court procedure, efile request for permission to bring in a laptop and cell phone during trial in the SDNY for J. Jurkevich and discuss with J. Jurkevich procedure to obtain a NY Secure Pass and SDNY pass	0.50	
12/28/15	MD	Assist in procedural support for getting an Order to Show Cause for a TRO filed in the SDNY for J. Jurkevich and travel to court to drop off courtesy copies of the Order to Show Cause to the Judgments and Orders clerk as directed by the Judge	2.00	
		Martha DelGiudice	2.50	\$662.50
Total Fees			124.70	\$43,971.50

Mark E. Duckstein	-	6.60	x	525.00	=	3,465.00
Jason L. Jurkevich	-	111.20	x	350.00	=	38,920.00
Edward V. Colavito	-	4.40	x	210.00	=	924.00
Martha DelGiudice	-	2.50	x	265.00	=	662.50

Court Reporter Transcript Fees	117.48
Pacer	11.10
Telephone Toll Charges	4.90
Outside Duplication	22.92
Duplication	224.64

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Federal Express	345.39
Computerized Research	1629.62
Duplication	42.60
Color Copies	278.00
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Total Disbursements	\$2,676.65
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<b>TOTAL THIS INVOICE</b>	<b>\$46,648.15</b>
<hr/>	
Prior Open Invoice (s)	\$13,365.82
<hr/>	
<b>TOTAL AMOUNT DUE</b>	<b>\$60,013.97</b>
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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI#22 - 1920331

RE: Pierre Grossman  
PO 650014726

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## REMITTANCE ADVICE

For legal services rendered through December 31, 2015.

Total Fees	\$43,971.50
Total Disbursements	\$2,676.65
<b>TOTAL THIS INVOICE</b>	<b>\$46,648.15</b>
Prior Open Invoice (s)	\$13,365.82
<b>TOTAL AMOUNT DUE</b>	<b>\$60,013.97</b>

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Elsevier, Inc.  
3251 Riverport Lane  
Maryland Heights, MO 63043

FEI # 22-1920331

Re: Pierre Grossman  
PO 650014726

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For legal services rendered through January 31, 2016.

			HOURS
01/04/16	MED	Revise submission to Court in further support of request for attachment, default judgment, and stay of trial.	1.10
01/05/16	MED	Conference with J. Jurkevich in preparation for pre-trial conference and attachment motion.	0.30
		Conference with J. Jurkevich regarding outcome of pre-trial conference and trial strategy issues.	0.60
		E-mail from M. Stratton regarding outcome of pre-trial conference.	0.10
01/07/16	MED	Assist with trial preparation (evidentiary issues, trial strategy, and jury charge).	0.80
01/14/16	MED	Telephone conference with J. Jurkevich regarding verdict and post-verdict strategy.	0.40
01/15/16	MED	Review Judge's Order regarding attachment issue.	0.10
		Legal research regarding attachment issue.	0.60
		Address potential post-trial motions.	0.30
01/21/16	MED	Conference with J. Jurkevich regarding post-trial	0.20

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		HOURS	
	motions and default judgment application.		
	Review verdict sheet.	0.10	
	Mark E. Duckstein	4.60	\$2,415.00
01/04/16	JLJ		
	Prepare letter in further support of request for stay of trial.	3.20	
	Prepare for final pre-trial conference.	1.30	
	Legal research for additional cases following or consistent with Rafael regarding inquest on damages for defaulting parties before trial against non-defaulting parties.	1.20	
01/05/16	JLJ		
	Participate in final pre-trial conference call, rulings on motions in limine, argument on application for attachment and stay of trial.	1.30	
	Telephone conference with M. Stratton regarding strategy for final pre-trial conference.	0.90	
	Exchange correspondence with M. Stratton, R. Guman, A. Pitts regarding schedule for trial, preparation.	0.50	
	Telephone conference with M. Stratton regarding issues, strategy for trial in light of in limine rulings.	0.50	
	Prepare for final pretrial conference, motion for attachment.	1.70	
	Review pretrial order and exhibits for examinations of R. Guman and A. Pitts.	3.30	
01/06/16	JLJ		
	Prepare examination outline for R. Guman.	9.80	
	Exchange correspondence with M. Stratton, R. Guman and A. Pitts regarding preparation sessions.	0.30	

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		HOURS
	Telephone conference with A. Deich (Judge's law clerk) regarding trial schedule, audio-visual logistics.	0.20
01/07/16	JLJ Review Court's proposed list of questions for jurors.	0.50
	Prepare correspondence to M. Stratton regarding Court's proposed list of questions for jurors.	0.20
	Review correspondence from P. Grossman to court regarding response to order to show cause on attachment.	0.40
	Coordinate with E. Colavito regarding PDF copies of trial exhibits.	1.10
	Prepare examination outline for R. Guman.	8.70
	Telephone conference with J. Sullivan (Moses & Singer) regarding request to stay trial.	0.30
	Telephone conference with M. Stratton regarding call from Moses & Singer regarding representation of Grossman, request to stay, strategy for trial date.	0.80
01/08/16	JLJ Prepare correspondence to P. Grossman regarding transcript of 1/5/16 final pretrial conference.	0.10
	Legal research regarding "false in one, false in all" jury instruction.	0.80
	Review trial materials (exhibits, transcripts, pleadings, discovery) on laptop, hard copy of exhibits, pretrial order, jury charges for trial starting 1/11/16.	3.90
01/09/16	JLJ Prepare opening statement for trial.	5.30
01/10/16	JLJ Meet with R. Guman, A. Pitts to prepare for trial examination.	10.30
01/11/16	JLJ Attend first day of trial (jury selection, opening	6.70

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		HOURS
	statements).	
	Meet with A. Pitts regarding examination outline.	1.10
	Prepare outline for examination of Pierre Grossman.	6.20
01/12/16	JLJ Attend second day of trial (examinatiosn of R. Guman and A. Pitts).	7.60
	Revise examination outline for P. Grossman.	5.30
01/13/16	JLJ Attend third day of trial (examination of P. Grossman, charge conference).	4.80
	Revise jury charge on damages regarding breach of contract.	1.40
	Prepare closing argument.	12.70
01/14/16	JLJ Attend fourth day of trial (closing arguments, jury deliberation and verdict).	9.60
	Analyze issues, strategy following verdict.	0.70
01/15/16	JLJ Review order denying application for attachment, without prejudice.	0.20
	Prepare correspondence to M. Stratton forwarding order denying attachment.	0.10
	Analyze strategy for post-trial motions.	0.40
01/21/16	JLJ Prepare correspondence to M. Stratton regarding initial thoughts on post-trial motions.	1.40
01/26/16	JLJ Review correspondence from M. Stratton regarding attachment motion.	0.10
	Prepare letter brief to Court regarding renewed motion for attachment.	3.20
	Prepare correspondence to M. Stratton regarding draft	0.10

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			HOURS	
		letter brief to Court in support of renewed motion for attachment.		
01/27/16	JLJ	Review correspondence from M. Stratton regarding comments to draft brief in support of renewed motion for attachment.	0.30	
		Revise letter brief in support of renewed motion for attachment.	1.20	
		Prepare declaration in support of renewed motion for attachment and exhibits.	1.00	
		Prepare notice of renewed motion for attachment and exhibits.	0.40	
		Finalize and file papers in support of renewed motion for attachment.	0.40	
		Exchange email correspondence with Judge Failla's law clerk regarding docketing of renewed motion papers.	0.20	
01/29/16	JLJ	Review correspondence from P. Grossman opposing renewed motion for attachment.	0.40	
		Jason L. Jurkevich	122.10	\$42,735.00
01/07/16	EVC	Assist counsel with preparation of electronic archive of plaintiff's exhibits.	1.20	
		Edward V. Colavito	1.20	\$252.00
		Total Fees	127.90	\$45,402.00

Mark E. Duckstein - 4.60 x 525.00 = 2,415.00



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Jason L. Jurkevich	-	122.10	x	350.00	=	42,735.00
Edward V. Colavito	-	1.20	x	210.00	=	252.00

Court Reporter Transcript Fees	2902.92
Train Fare	16.50
Lodging	583.17
Taxi/Car Rental/Car Service	298.42
Tolls/Mileage	19.40
Pacer	15.00
Telephone Toll Charges	4.23
Duplication	18.12
Velobinding	1.50
Federal Express	22.52
Computerized Research	206.28
Meals	70.88
Color Copies	3.00

Total Disbursements	\$4,161.94
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<b>TOTAL THIS INVOICE</b>	<b>\$49,563.94</b>
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Prior Open Invoice (s)	\$60,013.97
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<b>TOTAL AMOUNT DUE</b>	<b>\$109,577.91</b>
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Elsevier, Inc.  
3251 Riverport Lane  
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FEI#22 - 1920331

RE: Pierre Grossman  
PO 650014726

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## REMITTANCE ADVICE

For legal services rendered through January 31, 2016.

Total Fees	\$45,402.00
Total Disbursements	\$4,161.94
<b>TOTAL THIS INVOICE</b>	<b>\$49,563.94</b>
Prior Open Invoice (s)	\$60,013.97
<b>TOTAL AMOUNT DUE</b>	<b>\$109,577.91</b>

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Elsevier, Inc.  
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FEI # 22-1920331

Re: Pierre Grossman  
PO 650014726

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For legal services rendered through February 15, 2016.

			HOURS	
02/11/16	MED	Revise preliminary statement to post-trial brief; conference with J. Jurkevich re: arguments in favor of default judgment in full amount of claim and post-trial motion as to Grossman.	1.00	
02/12/16	MED	Address post-trial briefing strategy.	0.50	
02/14/16	MED	Revise Jurkevich Declaration re: litigation expense in support of fee award application.	0.80	
02/15/16	MED	Revise post-trial briefs.	0.40	
		Mark E. Duckstein	2.70	\$1,417.50
02/01/16	JLJ	Review order granting preliminary injunction restraining IBIS account.	0.20	
		Prepare correspondence to M. Stratton regarding preliminary injunction order.	0.10	
		Analyze issues regarding service of preliminary injunction order.	0.30	
02/02/16	JLJ	Telephone conference with M. Stratton regarding strategy for post-trial motions.	0.80	

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		HOURS
	Prepare correspondence to M. Stratton regarding proposed strategy for post-trial motions.	0.90
	Prepare restraining notice to Chase regarding preliminary injunction order.	1.10
	Legal research regarding imposition of RICO damages on defaulting parties following trial as to non-defaulting parties.	2.40
02/03/16	JLJ Legal research regarding damages for RICO conspiracy, inconsistent damage awards.	1.90
02/04/16	JLJ Legal research regarding entry of damages against defaulting parties after trial of non-defaulting parties.	6.30
02/08/16	JLJ Legal research regarding RICO Conspiracy damages.	1.20
	Legal research regarding fee awards for RICO plaintiffs.	0.30
	Prepare outline of arguments for post-trial motions.	3.70
02/09/16	JLJ Prepare post-trial motion to enter final judgment, award fees (preliminary statement, statement of facts).	7.40
02/10/16	JLJ Prepare argument section of post-trial motion brief regarding awarding of damages, pre-judgment interest.	11.90
02/11/16	JLJ Prepare argument section for recovery of attorneys fees and costs.	6.80
	Prepare declaration in support of recovery of attorneys fees and costs, entry of final judgment.	5.90
02/12/16	JLJ Legal research regarding Rule 50(b) motion for judgment as a matter of law or partial new trial under Rule 59.	3.70

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			HOURS		
		Analyze issues and strategy regarding Rule 50(b) motion for judgment as a matter of law or partial new trial under Rule 59.	0.90		
		Prepare brief in support of Rule 50(b) motion for judgment as a matter of law.	2.50		
02/13/16	JLJ	Prepare brief point on Rule 59 motion for new trial.	4.90		
02/14/16	JLJ	Prepare brief in support of damage award against defaulting parties.	10.20		
02/15/16	JLJ	Prepare notice of motion for Rule 50(b) motion for judgment as a matter of law or Rule 59(a) motion for new trial.	0.40		
		Prepare notice of motion for award of damages and final default judgment against PTI and IBIS.	0.30		
		Prepare notice of motion for award of fees and costs.	0.30		
		Prepare brief in support of motion for award of fees and costs.	4.70		
		Review invoices for privileged information to be redacted.	1.30		
		Review docket, trial transcripts for record citations for post-trial briefs.	1.90		
		Review correspondence from P. Grossman with post-trial motion to dismiss.	0.20		
		Jason L. Jurkevich	82.50		\$28,875.00
		Total Fees	85.20		\$30,292.50

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Mark E. Duckstein	-	2.70	x	525.00	=	1,417.50
Jason L. Jurkevich	-	82.50	x	350.00	=	28,875.00

<b>TOTAL THIS INVOICE</b>	<b>\$30,292.50</b>
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Prior Open Invoice (s)	\$109,577.91
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<b>TOTAL AMOUNT DUE</b>	<b>\$139,870.41</b>
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RE: Pierre Grossman  
PO 650014726

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## REMITTANCE ADVICE

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Total Fees	\$30,292.50
<b>TOTAL THIS INVOICE</b>	<b>\$30,292.50</b>
Prior Open Invoice (s)	\$109,577.91
<b>TOTAL AMOUNT DUE</b>	<b>\$139,870.41</b>

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